an STS management block for routing said incoming non-ATM signals as one of an output non-ATM signal and a passthrough non-ATM signal, for routing said passthrough non-ATM signal and an output non-ATM signal as said outgoing non-ATM signal, and for routing said incoming and outgoing ATM signals between said first and second ring interfaces and said ATM cell management block; and

a non-ATM payload management for processing and transmitting said output non-ATM signal to a non-ATM port, and for processing and transmitting said outgoing non-ATM signal to said STS management block.

REMARKS

By this Preliminary Amendment, Applicants have placed claims 1, 5-7, 10-12, 17, 18 and 21 in substantially the same form as they were in the parent case before they were canceled. At that point the Examiner had rejected these claims in view of Ashi et al., United States Patent No. 5,721,727, Ishibashi et al., United States Patent No. 5,663,949, and Kremer, United State Patent No. 5,394,389.

In the Final Office Action in the parent case, which was mailed on August 16, 1999, the Examiner argued that the claims were not related to a BLSR system, causing the Examiner to believe that Ashi was particularly relevant.

Most of the claims, however, were directed to a BLSR system, either explicitly or inherently. To avoid any confusion, however, Applicants have amended claims 1 and 21 to recited that the system is a BLSR type system, which removes the basis for the rejection.

Moreover, the Examiner never did suggest a motivation for combining the references. The only argument given by the Examiner is that it would have been well known to have a specified

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bandwidth in one SONET system. What the Examiner never addresses, however, is why a person of ordinary skill in the art would seek to combine two different technologies as shown in Ashi and Ishibashi.

The same is true with regard to the rejection of claim 17. Kremer involves interworking between two different types of rings, and Yoshimura describes a system with completely different protocols as used in the other references or in the claimed inventions. The Examiner never supplies any motivation for their combination. Finally, with regard to claim 21, the fact that Ishibashi does not disclose the processing of non-ATM signals is not solved by the fact that both types of signals are known in the art of telecommunications. There is no motivation that the Examiner has provided for combining Ishibashi together with Kremer. All the Examiner has done is indicate that the combination if were made would achieve the result of processing SONET signals, ATM signals, and non-ATM signals, but still fails to provide any motivation for that combination.

Because the claims, as amended, are not obvious over the cited references, Applicants request that these claims be allowed and passed issue.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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